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# IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA

Criminal No. 2:25-CV-

(18 U.S.C. §§ 2339B(a)(1), 1001(a)(2))

JACK DANAHER MOLLOY

v.

## INDICTMENT

## COUNT ONE

The grand jury charges:

From in and around August 2024, through in and around December 2024, in Lebanon, Syria, the Western District of Pennsylvania, and elsewhere, the defendant, JACK DANAHER MOLLOY, a United States citizen, did knowingly attempt to provide material support and resources, to wit: personnel (including himself) and services, to Hizballah, which at all relevant times was designated by the Secretary of State as a foreign terrorist organization under Section 219 of the Immigration and Nationality Act, knowing that Hizballah was a designated terrorist organization and that Hizballah had engaged in and was engaging in terrorist activity and terrorism.

In violation of Title 18, United States Code, Section 2339B(a)(1).

FILED

JAN - 2 2025

CLERK U.S. DISTRICT COURT WEST. DIST. OF PENNSYLVANIA

#### **COUNT TWO**

The grand jury further charges:

On or about October 20, 2024 and October 21, 2024, the defendant, JACK DANAHER MOLLOY, did willfully and knowingly make a materially false, fictitious, and fraudulent statement and representation in a matter within the jurisdiction of the executive branch of the Government of the United States, by telling agents from the Federal Bureau of Investigation in an interview at the Pittsburgh International Airport, in the Western District of Pennsylvania, that MOLLOY had no current or future plans to become involved with Hizballah. The statement and representation were false because, as JACK DANAHER MOLLOY then and there knew, he had current and future plans to become involved with Hizballah. This offense involved international terrorism.

In violation of Title 18, United States Code, Section 1001(a)(2).

### **COUNT THREE**

The grand jury further charges:

On or about October 20, 2024 and October 21, 2024, the defendant, JACK DANAHER MOLLOY, did willfully and knowingly make a materially false, fictitious, and fraudulent statement and representation in a matter within the jurisdiction of the executive branch of the Government of the United States, by telling agents from the Federal Bureau of Investigation in an interview at the Pittsburgh International Airport, in the Western District of Pennsylvania, that MOLLOY had no business in nor was he meeting anyone in Syria. The statement and representation were false because, as JACK DANAHER MOLLOY then and there knew, he travelled to Syria with the business of continuing his attempts to join Hizballah, and while in Syria, arranged to meet an individual there. This offense involved international terrorism.

In violation of Title 18, United States Code, Section 1001(a)(2).

FORFEITURE ALLEGATIONS

The grand jury realleges and incorporates by reference the allegations contained in

Counts One through Three for the purpose of alleging criminal forfeiture pursuant to Title 18,

United States Code, Sections 981(a)(1)(G)(i), (ii), and (iii) and Title 18, United States Code,

Section 2461(c).

The violation of Title 18, United States Code, Section 2339B(a)(1) alleged in Count

One of this Indictment is a federal crime of terrorism, as defined in Title 18, United States Code,

Section 2332b(g)(5), against the United States, citizens and residents of the United Sates, and their

property. As part of the commission of a violation of Title 18, United States Code, Section

2339B(a)(1), the following electronic media were acquired, maintained, involved in, used and

intended to be used in the knowing commission of that offense, and are subject to forfeiture:

a. Google Pixel 3 cellular phone, bearing serial number 938X1X17R; and

b. Prometheus XVI G2 laptop, bearing serial number 00342-21157-36254-AA.

A True Bill,

FOREPERSON

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